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HEARING DATE: April 30, 2019
TIME: 10:00 A.M.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In Re:

NEW ENGLAND MOTOR FREIGHT, INC.,
ET AL¹,

Debtor,

DECLARATION IN SUPPORT OF
MOTION FOR RELIEF FROM
AUTOMATIC STAY

CHAPTER 11
Case No. 19-12809-JKS

MICHAEL SINGLEY, pursuant to 28 U.S.C. § 1746, declares under the penalty of
perjury as follows:

1. I am a creditor in the above-referenced bankruptcy case. As such, I am fully familiar with the facts and circumstances set forth herein. I make this declaration in support of my motion, pursuant to 11 U.S.C. §§361 and 362, for relief from the automatic stay, to enable me to continue my New Jersey Superior Court personal injury action against Debtors, New England Motor Freight, and Jans Leasing Corp. (hereinafter "NEMF" and "JANS").
2. I am a resident of Wildwood, County of Cape May, New Jersey.

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

3. Upon information from counsel, at all times relevant, NEMF and JANS operated a trucking business, with a principal place of business at 1-71 North Avenue East, Elizabeth, NJ, 01201.
4. On March 15, 2017, I suffered personal injuries as a result of a motor vehicle accident on State Highway 55 in Vineland, New Jersey.
5. Upon information from counsel, NEMF and JANS were the owners and/or operator of a certain 2003 Mack 99 tractor trailer bearing New Jersey license plate number AN951FLF, involved in aforesaid motor vehicle accident (hereinafter the "Vehicle").
6. At the time of the accident the Vehicle was driven by David Wood, who as an employee of NEMF and JANS.
7. On or about January 24, 2019, I commenced an action in New Jersey Superior Court, Cape May County, seeking compensation from NEMF, JANS, David Wood, and other defendants for personal injuries I suffered as a result of the aforesaid motor vehicle accident ("Superior Court Action"). A copy of the Summonses and Complaint are attached to the Declaration of my attorney, Richard J. Albuquerque, Esquire, as Exhibit "A."
8. I am seeking relief from the automatic stay so that I may proceed with the litigation that was commenced in the Superior Court of New Jersey, Cape May County and liquidate my personal injury claim against NEMF, JANS and other defendants.
9. I respectfully submit that, based upon the facts of this case, "cause" exists to lift the automatic stay.

10. Pursuant to 11 U.S.C. § 1746, I certify that under penalty of perjury that the foregoing
is true and correct to the best of my knowledge and belief.

Dated: April 10, 2019

BY: /S/ Michael Singley